

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

v.

**JOSEPH CARAMADRE, and
RAYMOUR RADHAKRISHNAN**

Criminal No. 1:11-cr-00186-S

MOTION TO CONTINUE SENTENCING HEARING

Now comes the Defendant, Joseph Caramadre, through counsel, and hereby moves this Honorable Court to continue the sentencing hearing in the above-referenced matter, currently scheduled for Friday, March 29, 2013 at 10 a.m. For reason, counsel informs the Court that Mr. Caramadre has filed a motion to withdraw his guilty plea, and respectfully requests that the sentencing be continued until the motion to withdraw the plea is adjudicated. In addition, undersigned counsel is successor counsel, has recently entered on this case, and requires additional time to complete preparation for the sentencing hearing.

Respectfully submitted,
Joseph Caramadre,
By his attorney,

/s/Randy Olen, Esq.

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Providence, RI 02909
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CERTIFICATION

I hereby certify that on this 1st day of March, 2013, I caused to be delivered, via electronic delivery, the within ***Motion*** to:

John P. McAdams, Esq.
U.S. Attorney's Office
50 Kennedy Plaza, 8th Floor
Providence, RI 02903

Lee Vilker, Esq.
U.S. Attorney's Office
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Olin W. Thompson, Esq.
Federal Defender's Officer
10 Weybosset Street, Suite 300
Providence, RI 02903,

/s/Randy Olen, Esq.
